

Granted.

9:06 AM, Feb 16, 2024

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**



BUSH TRUCK LEASING, INC.,

Plaintiff,

-v-

ALL WAYS AUTO TRANSPORT, LLC,

Defendant.

Case No. 1:20-cv-00511

Judge Susan J. Dlott

Magistrate Judge Karen L. Litkovitz

**JOINT PROPOSED AMENDED
CALENDAR ORDER**

The parties, Bush Truck Leasing, Inc. (“BTL”), and All Ways Auto Transport, LLC (“AWA”), pursuant to the Court’s February 8, 2024 Order ([Dkt. 119](#)), hereby submit this Proposed Calendar Order:

Proposed New Schedule Dates

- May 3, 2024: deadline for remaining/reopened fact depositions (other than the Rule 30(b)(6) deposition of Dickinson Fleet Services, LLC)¹;
- June 7, 2024: rebuttal expert report disclosures;
- July 26, 2024: deadline for expert depositions/discovery;
- September 13, 2024: deadline for summary judgment.

¹ AWA intends to depose Dickinson as promptly as possible, but given that Dickinson has suggested that it may file a motion to quash a subpoena, AWA may not be able to depose Dickinson by May 3, 2024.

Respectfully submitted,

/s/ Jacob D. Rhode (email authority)

Jacob D. Rhode (008936) (Trial Attorney)
Carson E. Miller (0100203)
Laura Gates Rai (0102268)
Keating Muething & Klekamp, PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
jrhode@kmklaw.com;
carson.miller@kmklaw.com
lrai@kmklaw.com
Phone: (513) 579-6528
Fax: (513) 579-6457

Counsel for Plaintiff

/s/ Rick L. Ashton

Rick L. Ashton (0077768), Trial Attorney
Jeffrey R. Corcoran (0088222)
Allen Stovall Neuman Fisher & Ashton LLP
17 South High Street, Suite 1220
Columbus, OH 43215
T: 614-221-8500
F: 614-221-5988
ashton@asnfa.com; corcoran@asnfa.com

and

Reda & Des Jardins, LLC
736 N. Western Avenue, Suite 353
Lake Forest, Illinois 60045
T: (877) 809-4567
F: (224) 232-8897
Email: service@rdlawyers.com

*Counsel for Defendant All Ways
Auto Transport, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing were served upon all counsel of record via the Court's CM/ECF system on this 15th day of February, 2024.

/s/ Rick L. Ashton

Rick L. Ashton